

**Exhibit A**

**Proposed Order**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates to the  
Commonwealth, HTA, and ERS.**

ORDER GRANTING TWO HUNDRED NINETY-THIRD OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO, THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO, AND THE PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY TO DEFICIENT BOND CLAIMS

*Upon the Two Hundred Ninety-Third Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Highways and Transportation Authority to*

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA", and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the "Debtors") (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

*Deficient Bond Claims* [ECF No. 15716] (the “Two Hundred Ninety-Third Omnibus Objection”),<sup>2</sup> filed by the Commonwealth of Puerto Rico (“Commonwealth”), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), and the Puerto Rico Highways and Transportation Authority (“HTA”), dated January 22, 2021, for entry of an order disallowing in their entirety certain claims filed against the Commonwealth, ERS, or HTA, as more fully set forth in the Two Hundred Ninety-Third Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Two Hundred Ninety-Third Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Two Hundred Ninety-Third Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in Exhibit A to the Two Hundred Ninety-Third Omnibus Objection (collectively, the “Deficient Bond Claims”) having been found to be deficient; and the Court having determined that the relief sought in the Two Hundred Ninety-Third Omnibus Objection is in the best interests of the Commonwealth, ERS, HTA, their creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Two Hundred Ninety-Third Omnibus Objection establish just cause for the relief granted herein; and the Court having deemed a hearing is not necessary as no objection, responsive pleading, or request for a hearing with respect to the Two Hundred Ninety-Third Omnibus Objection has been submitted, and after due deliberation and sufficient cause appearing therefor, it is hereby

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<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Two Hundred Ninety-Third Omnibus Objection.

ORDERED that the Two Hundred Ninety-Third Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Deficient Bond Claims are hereby disallowed in their entirety; and it is further

ORDERED that Prime Clerk, LLC, is authorized and directed to designate the Deficient Bond Claims as expunged in the official claims registry in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 15716 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: \_\_\_\_\_

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Honorable Judge Laura Taylor Swain  
United States District Judge

**EXHIBIT A**

**Schedule of Claims Subject to the Two Hundred Ninety-Third Omnibus Objection**

Two Hundred and Ninety-Third Omnibus Objection  
Exhibit A - Bondholder Deficient

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	BROOK II, SPRUCE 200 RIVER'S EDGE DRIVE SUITE 300 MEDFORD, MA 02155	6/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	47211	\$ 41,360,000.00
	Reason: Proof of claim purports to assert liabilities associated with municipal bond(s) issued by the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, HTA, and/or ERS, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors					
2	BROOKS, DAVID 700 HIGHSPIRE RD GLENMOORE, PA 19343-1142	4/8/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	4446	\$ 7,500.00
	Reason: Proof of claim purports to assert liabilities associated with municipal bond(s) issued by the Puerto Rico Highways and Transportation Authority, but fails to provide any basis or supporting documentation for asserting a claim against the Puerto Rico Highways and Transportation Authority such that the Debtors are unable to determine whether claimant has a valid claim against the Puerto Rico Highways and Transportation Authority or any of the other Title III debtors					
3	CACHO CACHO, JUANA BOX 574 DORADO, PR 00646	5/2/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	10104	\$ 62,765.91
	Reason: Proof of claim purports to assert liabilities associated with municipal bond(s) issued by the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, HTA, and/or ERS, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors					
4	CAPARROS SANTOS, HELVIA S. ATTN: PATRICK D. O'NEIL 252 PONCE DE LEON AVE. SUITE 1701 SAN JUAN, PR 00918	5/21/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	17107	\$ 12,145.25
	Reason: Proof of claim purports to assert liabilities associated with municipal bond(s) issued by the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, HTA, and/or ERS, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors					
5	COOP AHORRO Y CREDITO EMPLEADOS FIRST BANK PO BOX 9146 SAN JUAN, PR 00926-9710	6/12/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	56194	Undetermined*
	Reason: Proof of claim purports to assert liabilities associated with municipal bond(s) issued by the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, HTA, and/or ERS, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors					
6	COOPERATIVA DE AHORRO Y CREDITO DE LARES PO BOX 191757 SAN JUAN, PR 00919	9/25/2019	17 BK 03283-LTS	Commonwealth of Puerto Rico	170916	\$ 573,278.14
	Reason: Proof of claim purports to assert liabilities associated with municipal bond(s) issued by the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, HTA, and/or ERS, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors					

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	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
7	DEVELOPERS GROUP INC. PMB 356 1353 CARR. 19 GUAYNABO, PR 00966	4/12/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	6077	\$ 981,344.71
	Reason: Proof of claim purports to assert liabilities associated with municipal bond(s) issued by the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, HTA, and/or ERS, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors					
8	MARROIG, JUAN URB. MANSION REAL BOX 404 COTO LAUREL, PR 00780	9/27/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	167580	\$ 90,000.00*
	Reason: Proof of claim purports to assert liabilities associated with municipal bond(s) issued by the Puerto Rico Highways and Transportation Authority, but fails to provide any basis or supporting documentation for asserting a claim against Commonwealth of Puerto Rico, HTA, and/or ERS such that the Debtors are unable to determine whether claimant has a valid claim against the Puerto Rico Highways and Transportation Authority or any of the other Title III debtors					
9	MUTH, JOHN T 5703 GLEN CARLA DR. HUNTINGTON, WV 25705	3/22/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	3720	\$ 13,720.47
	Reason: Proof of claim purports to assert liabilities associated with municipal bond(s) issued by the Puerto Rico Highways and Transportation Authority, but fails to provide any basis or supporting documentation for asserting a claim against the Puerto Rico Highways and Transportation Authority such that the Debtors are unable to determine whether claimant has a valid claim against the Puerto Rico Highways and Transportation Authority or any of the other Title III debtors					
10	QUILICHINI PAZ, FLORENCE PO BOX 9020895 SAN JUAN, PR 00902-0895	5/29/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	27559	\$ 48,140.50
	Reason: Proof of claim purports to assert liabilities associated with municipal bond(s) issued by the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, HTA, and/or ERS such that the Debtors are unable to determine whether claimant has a valid claim against the Employees Retirement System of the Government of the Commonwealth of Puerto Rico or any of the other Title III debtors					
11	RAMIREZ DE ARELLANO, ALFRED JOSE E ROSARIO PO BOX 191089 SAN JUAN, PR 00919-1089	6/27/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	107132	\$ 4,069.00
	Reason: Proof of claim purports to assert liabilities associated with municipal bond(s) issued by the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, HTA, and/or ERS, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors					

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	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
12	REYES GILESTRA, TRISTAN GUELOP VILLAS PALMAR SUR 2 PALMA DE MARCA CAROLINA, PR 00979	4/27/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	9356	\$ 2,362,000.00
	Reason: Proof of claim purports to assert liabilities associated with municipal bond(s) issued by COFINA, PREPA, PRPBA, and GDB, but fails to provide any basis or supporting documentation for asserting a claim against COFINA, PREPA, PRPBA, and GDB, such that the Debtors are unable to determine whether claimant has a valid claim against COFINA, PREPA, PRPBA, and GDB or any of the other Title III debtors					
13	ROSARIO MOJICA, EUGENIO URB. ENCANTADA PARQUE DEL RIO PE12 VALLE DEL RIO TRUJILLO ALTO, PR00976	6/5/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	50851	\$ 15,882.27
	Reason: Proof of claim purports to assert liabilities associated with municipal bond(s) issued by the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, HTA, and/or ERS, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors					
14	STEWART, RICHARD 2701 HAMPTON CIRCLE N DELRAY BEACH, FL33445	5/29/2020	17 BK 03283-LTS	Commonwealth of Puerto Rico	174072	\$ 120,000.00
	Reason: Proof of claim purports to assert liabilities associated with municipal bond(s) issued by the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, HTA, and/or ERS, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors					
15	SUCESION J. SERRALLES SECOND, INC PO BOX 801201 COTO LAUREL, PR 00780-1201	5/21/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	18289	\$ 90,000.00
	Reason: Proof of claim purports to assert liabilities associated with municipal bond(s) issued by the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, HTA, and/or ERS, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors					
16	SUSAN A JENNINGS, TRUSTEE 4009 GREENVIEW DR URBANDALE, IA 50322	3/5/2020	17 BK 03283-LTS	Commonwealth of Puerto Rico	173717	\$ 1,130,002.92
	Reason: Proof of claim purports to assert liabilities associated with municipal bond(s) issued by the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, HTA, and/or ERS, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors					



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NAME		DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
17	WINER, LEON REGENCY PARK SUITE 1902, 155 CORAZO ST. GUAYNABO, PR 00971-7801	5/18/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	16556	\$ 55,000.00
Reason: Proof of claim purports to assert liabilities associated with municipal bond(s) issued by the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, HTA, and/or ERS, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors					TOTAL	\$ 46,925,849.17*